

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

No. \_\_\_\_\_

ANTHONY ACCURSO,  
Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, FEDERAL BUREAU OF INVESTIGATION,  
Defendant.

## COMPLAINT FOR INJUNCTIVE RELIEF

1. This is an action under the Freedom of Information Act, 5 U.S.C. § 552, to order the production of agency records, concerning past investigations regarding Plaintiff, which Defendant has improperly withheld from Plaintiff.
2. This court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B), and venue lies in this district because it is the location of the defendant and all its subordinates involved in the complaint.
3. Plaintiff Anthony Accurso is an inmate in the custody of the Federal Bureau of Prisons, specifically FCI Seagoville.
4. Defendant U.S. Department of Justice, Federal Bureau of Investigation is an agency of the United States and has possession of the documents that Plaintiff seeks.
5. On June 10, 2019, Plaintiff requested access to agency files about the investigation which led to his arrest and conviction in 2013, and he did so by mailing a production request to Defendant.
6. In a letter dated June 20, 2019, Defendant responded by denying Plaintiff's request.
7. On July 1, 2019, Plaintiff sent an appeal to the Director of the Office of Information Policy, as directed by Defendant's denial letter, requesting Defendant reconsider its decision. To Date, Defendant has not responded.
8. Plaintiff has a right of access to the requested information under 5 U.S.C. § 552(a)(3) and § 552a(d)(1), and there is no legitimate legal basis for Defendant

to deny Plaintiff access to the records in question.

FOR THESE REASONS, Plaintiff requests that this Court:

- (1) Order Defendant to provide access to the requested documents in totality with no redaction or withholding;
- (2) Expedite this proceeding as provided for in 28 U.S.C. § 1657;
- (3) Award Plaintiff costs and fees in this action, as provided in 5 U.S.C. § 552(a)(4)(E); and
- (4) Grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

Anthony Accurso  
Anthony Accurso 28981-044  
Federal Correctional Institution  
P.O. Box 9000  
Seagoville, TX 75159

August 14, 2019  
date